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13 UNITED STATES OF AMERICA

14
15 UNITED STATES DISTRICT COURT
16 FOR THE CENTRAL DISTRICT OF CALIFORNIA

17 UNITED STATES OF AMERICA

2 :24-CR-000456-TJH

18 v.

19 STIPULATION AND PROPOSED
SCHEDULING ORDER

20 ANDREW LEFT,

21 Defendant.

22 The United States of America, by and through counsel of record,
23 and Defendant Andrew Left, by and through his counsel of record,
hereby stipulate that:

24 1. On September 4, 2024, this Court issued a Trial Setting Order.
25 (ECF No. 1.) The order stated that: "All motions under Rule 12
26 of the Federal Rules of Criminal Procedure shall be filed no
27 later than January 27, 2025; oppositions shall be filed three
28 weeks after any Rule 12 motion is filed; an optional reply brief

1 may be filed two weeks after an opposition, and the Rule 12
2 motion, if filed, shall be noticed for a hearing at least seven
3 weeks after the date it is filed, or a following date convenient
4 for the Court." Id. ¶3a.

5 2. On January 27, 2025, defendant timely filed a motion to dismiss
6 the indictment and, consistent with the scheduling order,
7 noticed the hearing for the motion to dismiss on March 17, 2025.
8 (ECF No. 34.)

9 3. However, counsel for the United States, specifically counsel
10 from the U.S. Department of Justice Criminal Division's Fraud
11 Section, are unable to travel from Washington, D.C. to Los
12 Angeles for the hearing on that date.

13 4. The parties have conferred and are available on the next
14 criminal hearing date: March 24, 2025.

15 5. In order to accommodate the appearance of all counsel for the
16 government on this dispositive motion, the government
17 respectfully requests that the Court adjourn the hearing to
18 March 24, 2025.

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1 6. Counsel for defendant does not object to continuing the hearing
2 on the motion to dismiss to March 24, 2025.

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4 IT IS SO STIPULATED.

5 DATE: February 18, 2025

6 Respectfully submitted,

7
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